



**ZEON CHEMICALS L.P.**  
4100 Bells Lane  
Louisville, KY 40211-2127 USA  
1.800.776.2460 | 1.502.775.7600  
FAX: 1.502.775.7614  
WWW.ZEONCHEMICALS.COM

**By UPS**

May 14, 2020

Mr. Matt King, P.E.  
Industrial Permitting Manager  
Louisville Metro Air Pollution Control District  
701 West Ormsby Ave., Suite 303  
Louisville, KY 40203

***Re: 2019 Annual Title V Compliance Certification for Zeon Chemicals L.P.'s Louisville, Kentucky Plant (Plant ID No. 0283), Title V Operating Permit No. 151-97-TV (R8)***

Dear Mr. King:

Zeon Chemicals L.P (Zeon) is pleased to submit the above-referenced document pursuant to General Condition 2 of the Title V Operating Permit No. 151-97-TV (R8) for the Louisville, Kentucky Plant. Please note, Zeon operated under Title V Operating Permit No. 151-97-TV (R8) from January 1, 2019 through December 31, 2019.

In accordance with LMAPCD Regulation 2.16; Section 3.5.11, the following certification applies:

*Based on information and belief formed after reasonable inquiry, I certify the statements and information in these reports are true, accurate and complete.*

Please address any questions which may arise concerning this document, or any requests for additional information to Ruben Carrillo-Millan at (502) 775-7625.

Respectfully submitted,

Ravi Ramesh Srinivas  
Plant Manager

Attachment

cc: Ms. Beverly Banister, Director  
APTMD – 12<sup>th</sup> Floor  
U.S. EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960



# Louisville Metro Air Pollution Control District

## Annual Compliance Certification

Form 9400-O

Mail application to:  
701 W. Ormsby Ave. Suite 303  
Louisville, KY 40203

OR  
e-mail to:  
[airpermits@louisvilleky.gov](mailto:airpermits@louisvilleky.gov)

(502) 574-6000  
FAX: (502) 574-5137  
[www.louisvilleky.gov/apcd](http://www.louisvilleky.gov/apcd)

INSTRUCTIONS: There are 4 pages to this form. On this page, complete Sections A and B once with respect to the entire annual compliance certification.

### A. General Information

#### 1. Identifying Information

Source or company name: Zeon Chemicals L.P. Plant ID: 0283  
Source street address: 4100 Bells Lane  
City: Louisville State: KY ZIP: 40211  
Contact person: Ruben Carrillo-Millan Title: Corporate Environmental Engineer  
e-mail address: Ruben.Carrillo-Millan@zeonchemicals.com  
Telephone: (502) 775-7625 Ext. N/A Title V permit no.: 151-97-TV (R8)

Applicant is: ☐ Owner ☐ Operator ☒ Owner & Operator ☐ Corporation/LLC ☐ LP

- If the applicant is a Corporation or a Limited Liability Corporation, submit a copy of the current Certificate of Authority from the Kentucky Secretary of State.
- If the applicant is a Limited Partnership, submit a copy of the current Certificate of Limited Partnership from the Kentucky Secretary of State.

☒ Certificate has not changed since last submission on 4 / 12 / 2018. (a new certificate is not required.)

**2. Reporting Period** The reporting period should be the one year, or shorter period, required by your Title V permit. It will be assumed that the dates begin and end at midnight (12a.m.) unless you specify otherwise.

Period beginning: January 1, 2019 Period ending: December 31, 2019

### B. Certification of Truth, Accuracy, and Completeness

#### 1. Responsible Official

Name: (Last) Srinivas (First) Ravi (Middle) Ramesh  
Title: Plant Manager  
Street or P.O. Box: 4100 Bells Lane  
City: Louisville State: KY ZIP: 40211  
e-mail address: Ramesh.Srinivas@zeonchemicals.com  
Telephone: (502) 775-7633 Ext. N/A Facsimile: (502) 775-7614 Ext. N/A

#### 2. Certification of Truth, Accuracy, and Completeness

The Responsible Official must sign this statement after the form is completed for each applicable requirement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate, and complete.

Name: (signed)

Name: (printed or typed) Ravi Ramesh Srinivas

Date: 5/14/2020



Instructions: Use this page to describe the compliance status of each permit term or condition. This page may be used to provide information on 2 different permit terms or conditions. Copy this page as many times as necessary to cover all permit terms and conditions.

C. Compliance Status of Each Permit Term or Condition		
Identify (Describe and Cross reference the Permit Term or Condition)	Emission Unit ID(s) and Emission Process ID(s):	Compliance Status during Reporting Period:
<i>Please see attachment.</i>		<input type="checkbox"/> Intermittent Compliance
		<input type="checkbox"/> Continuous Compliance

D. Methods Used to Determine Compliance
Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

C. Compliance Status of Each Permit Term or Condition		
Identify (Describe and Cross reference the Permit Term or Condition)	Emission Unit ID(s) and Emission Process ID(s):	Compliance Status during Reporting Period:
		<input type="checkbox"/> Intermittent Compliance
		<input type="checkbox"/> Continuous Compliance

D. Methods Used to Determine Compliance
Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

## E. Deviations from Permit Terms and Conditions

The table below is appropriate for reporting deviations from permit terms or conditions that have been previously reported in a six-month monitoring report (assuming that the most recent six-month monitoring report and the annual compliance certification both end on the same date). Copy this page as many times as necessary to include all such deviations. Note that you may cross-reference deviations already reported in the six-month report in the first column of the table, and leave the other columns blank, however such cross-reference must be clear and unambiguous with respect to the six-month monitoring report and the individual deviation being cross-referenced. In addition, in the first column, whether you cross-reference deviations or not, you must indicate whether each deviation is a "possible exception to compliance." If a deviation is not a possible exception to compliance, please briefly explain why it is allowed by the permit and cite the relevant permit term that provides the excuse. In addition, if there are deviations that have never been reported in writing to the permitting authority, more information than required by this table will be needed. In such cases, you must include information consistent with Section D of the six-month monitoring report form, and indicate whether it is a Possible exception to compliance."

Permit term for which there is a deviation, and Whether the deviation is a "Possible Exception" to compliance.	Emission Unit ID and Emission Process ID	Deviation Time Period Date (M/D/Y) Time (H:M) Time Zone	Written Deviation Report Submittal Date (M/D/Y)
<i>Please see attachment.</i>		Beginning: a.m. EST Ending: p.m. EST	
		Beginning: a.m. EST Ending: p.m. EST	

<b>F. Insignificant Activities</b>					
List all current insignificant activities, including any additions or removals					
<b>Description</b>	<b>Quantity</b>	<b>Number Added</b>	<b>Number removed</b>	<b>Reason for being an Insignificant Activity</b>	
Fixed or mobile internal combustion engines and vehicles used for transport of passengers or freight, unless regulated elsewhere.	8	0	0	Reg. 1.02.A.2	
Brazing, soldering or welding equipment.	1	0	0	Reg. 1.02.A.3.4	
Containers, reservoirs, or tanks used exclusively for storage of lubricating oils or fuel oils with a vapor pressure of less than 10 mm Hg at conditions of 20°C and 760 mm Hg.	8	0	0	Reg. 1.02.A.3.9.2	
Emergency relief vents, stacks, and ventilating equipment.	671	0	0	Reg. 1.02.A.3.10	
Laboratory ventilating and exhausting systems which are not used for radioactive air contaminants.	7	0	0	Reg. 1.02.A.3.11	
Portable diesel tanks with a maximum storage capacity of less than 500 gallons.	3	0	0	Reg. 1.02.A.3.23	
<b>See attached list.</b>					



UPS CampusShip: View/Print Label

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2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

Hand the package to any UPS driver in your area.

UPS Access Point™  
ZELLERS HARDWARE STORE INC  
1452 DIXIE HWY  
LOUISVILLE ,KY 40210

UPS Access Point™  
CVS STORE # 6203  
3997 7TH STREET RD  
LOUISVILLE ,KY 40216

UPS Access Point™  
BOOST MOBILE 1857  
1855 BERRY BLVD  
LOUISVILLE ,KY 40215

FOLD HERE

COX DAWN 502.775.7652 ZEON CHEMICALS LP 4100 BELLS LN LOUISVILLE KY 40211		0.0 LBS LTR		1 OF 1	
SHIP TO: ATTN: MATT KING - IND. PERMIT MGR LOUISVILLE AIR POLLUTION CONTROL DI STE. 303 701 W. ORMSBY AVE. LOUISVILLE KY 40203-3143		KY 402 9-01			
		UPS NEXT DAY AIR SAVER 1P			
TRACKING #: 1Z 409 52E 13 9084 0930		BILLING: P/P		COST CENTER: 1111	
				CS 22.011. WNTNY50 28.0A 04/2020	
					

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Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.



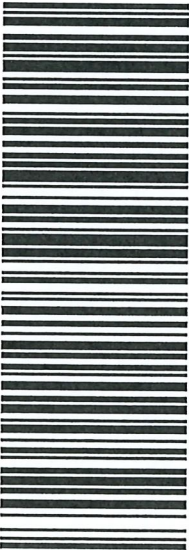
Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.  
Hand the package to any UPS driver in your area.

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UPS Access Point™  
BOOST MOBILE 1857  
1855 BERRY BLVD  
LOUISVILLE ,KY 40215

FOLD HERE

COX DAWN 502.775.7652 ZEON CHEMICALS LP 4100 BELLS LN LOUISVILLE KY 40211		0.0 LBS LTR		1 OF 1	
SHIP TO: BEVERLY H BANISTER U.S. EPA APTMD - 12TH FLOOR 61 FORSYTH ST SW ATLANTA GA 30303-8930					
		GA 303 9-02 			
UPS NEXT DAY AIR SAVER 1P TRACKING #: 1Z 409 52E 13 9400 5728					
BILLING: P/P					
COST CENTER: 1111		CS 22.0.11. WNTNV50 28.0A 04/2020 